

Hearing: January 29, 2014 at 10:00 am. (Prevailing Eastern Standard Time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: :
LEHMAN BROTHERS HOLDINGS INC., *et al.* : Chapter 11
Debtors. : Case No. 08-13555 (JMP)
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**JOINDER TO RESPONSE IN OPPOSITION OF PRINCIPAL LIFE INSURANCE
COMPANY TO THE MOTION OF LEHMAN BROTHERS HOLDINGS, INC.,
PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY CODE AND
BANKRUPTCY RULE 7004(a)(1), TO EXTEND STAY OF
AVOIDANCE ACTIONS AND GRANT CERTAIN RELATED RELIEF**

Safety National Casualty Corporation (“Safety National”) and Reliance Standard Life Insurance Company (“Reliance Standard”), by and through their counsel, Sidley Austin LLP, hereby join in Principal Life Insurance Company’s (“Principal Life”) Response in Opposition

(the “Principal Objection”) to the Motion of Lehman Brothers Holdings Inc. (“LBHI”) to Extend the Stay of Avoidance Actions and Grant Certain Related Relief (the “Motion”), and respectfully state as follows:

OBJECTION AND JOINDER

1. Safety National and Reliance Standard are both Avoidance Action Defendants in the Distributed Action.¹
2. Safety National and Reliance Standard hereby (a) adopt and incorporate by reference the arguments, in their entirety, made by Principal Life in the Principal Objection [D.I. # 42119]; (b) join in the Principal Objection; and (c) reserve all rights to be heard before the Court with respect to the Motion.

¹ Capitalized terms not otherwise defined herein have the meaning ascribed to such terms in the Motion

WHEREFORE, Safety National and Reliance Standard respectfully request that the Court deny the Motion to the extent it attempts to impose LBHI's proposed litigation Protocols upon Safety National and Reliance Standard.

Dated: January 22, 2014
New York, New York

SIDLEY AUSTIN LLP

By: /s/ Michael G. Burke
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